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7 *BTO INVESTMENTS, INC.*

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 HOLLY MARIE WOOD, an individual,
13 Plaintiff,

14 vs.

15 CARL'S JR., operated and owned by BTO
INVESTMENTS, a Delaware corporation;
16 S.L. INVESTMENTS, a Nevada
corporation; CKE RESTAURANTS, INC., a
17 Delaware corporation; CARL'S JR.
RESTAURANTS, LLC, a foreign limited
18 liability company; CARL KARCHER
ENTERPRISES, INC., a foreign
19 corporation; CKE RESTAURANTS
HOLDINGS, INC., a foreign corporation;
20 RUCEY MOLINA CRUZ, an individual;
DOES 1 through 10, inclusive; ROE
21 CORPORATIONS/ENTITIES 1 through 10,
inclusive;

22 Defendants.
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CASE NO. 2-20-cv-02329-APG-BNW

DEFENDANTS' JOINT MOTION TO
EXTEND DISCOVERY DEADLINES

25 COME NOW, Defendants, BTO INVESTMENTS, INC., S.L. INVESTMENTS, CKE
26 RESTAURANTS, INC., CARL'S JR. RESTAURANTS, LLC, CARL KARCHER
27 ENTERPRISES, INC., and CKE RESTAURANTS HOLDINGS, INC. (hereinafter
28

collectively, "Defendants"), by and through their respective counsel of record, and pursuant to FRCP 26 and LR 26-3, move this Court for an Order extending discovery deadlines for good cause shown.

This Motion is made and based upon LR IA 6-1, LR 7-1, and LR 26-3, the memorandum of points and authorities, the declaration of Jesselyn V. De Luna, and any oral argument the Court deems appropriate.

Respectfully submitted,

DATED this 30th day of August, 2021.

LEWIS BRISBOIS BISGAARD &
SMITH LLP

ALVERSON TAYLOR & SANDERS

/s/ Josh Cole Aicklen

/s/ Karie N. Wilson

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/s/ Rachel L. Wise

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*Attorneys for Defendant
S.L. INVESTMENTS*

DECLARATION OF JESSELYN V. DE LUNA, ESQ.

I, JESSELYN V. DE LUNA, declare and state as follows:

1. I am an associate in the law firm of Lewis Brisbois Bisgaard & Smith, LLP, am duly licensed to practice law in the State of Nevada, and am an attorney for Defendant BTO Investments, Inc. in the above-captioned matter.

2. I have personal knowledge of the facts set forth hereunder and am competent to testify to the same.

3. In late July, our office proposed a mediation in this case, to which all parties agreed. A true and correct copy of this email chain is attached hereto as **Exhibit A**.

4. The mediation was eventually scheduled for Monday, September 27, 2021 with Judge Trevor Atkin (Ret.) at Advanced Resolution Management.

5. In light of the pending mediation, it was discussed that major discovery would be paused to allow the parties time to prepare for the mediation without incurring potentially unnecessary discovery costs. To this end, it was agreed by all parties that the scheduled deposition of Plaintiff Wood, which was set to take place on Monday, July 26, 2021, was cancelled. See, Exhibit A.

6. Initial expert disclosures are currently due on September 20, 2021, exactly one week before the scheduled mediation. Given the parties' interest in avoiding unnecessary discovery expenses, a draft Amended Discovery Plan and Scheduling Order was circulated on August 20, 2021. All parties agreed to the extension except for Plaintiff. I called Plaintiff's counsel's office and spoke with Paul Padda, Esq. who advised that an answer would be provided the following Monday. On Monday, August 23rd, Plaintiff's counsel declined to stipulate to an extension of deadlines. A true and correct copy of this email chain is attached hereto as **Exhibit B**.

7. Because of Plaintiff's refusal to extend the current deadlines, the mediation was cancelled to allow the parties time to focus on completing discovery as soon as possible in order to go to trial. However, due to certain circumstances discussed herein, defense counsel for BTO Investments, Inc., S.L. Investments, and the CKE Defendants

1 agree that an extension of time is necessary. As such, Defendants are forced to bring
2 forth the instant Joint Motion.

3 8. The instant Motion is timely as it is brought no later than 21 days before the
4 expiration of the next deadline, September 20, 2021, in accordance with LR 26-3.

5 9. The instant Motion is brought in good faith and not for the purpose of undue
6 delay.

7 I declare under penalty of perjury under the laws of the United States of America
8 that the foregoing is true and correct.

9 Executed on August 30, 2021 in Las Vegas, Nevada.

10
11 */s/ Jesselyn V. De Luna*

12 _____
JESSELYN V. DE LUNA
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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

This is a civil rights employment discrimination, sexual assault, and battery action brought by Plaintiff Holly Marie Wood (“Plaintiff”) against CKE Restaurants, Inc., Carl’s Jr. Restaurants, LLC, Carl Karcher Enterprises, Inc., and CKE Restaurants Holdings, Inc. (hereinafter collectively, “CKE Defendants”), BTO Investments, Inc., and S.L. Investments. Plaintiff alleges Defendants are vicariously liable for her injuries. See generally, Complaint. Plaintiff filed her Complaint on September 18, 2020.

Local Rule 26-1(b)(1) provides that “unless otherwise ordered, discovery periods longer than one hundred and eighty (180) days from the date the first defendant answers or appears will require special scheduling review.” On February 23, 2021, the Court granted the parties’ Proposed Discovery Plan and Scheduling Order, approving the parties’ request for a 240-day discovery period, as reasonable and necessary, in light of the impact of the COVID-19 pandemic. (Doc. 30). On June 25, 2021, the Court granted the parties’ Amended Plan and Scheduling Order, approving the parties’ request that an additional 90 days be added to the discovery period, for a total of 330 days, based on certain extenuating circumstances, including the unsuccessful Early Neutral Evaluation on March 10, 2021 leading to the entry of Defendant S.L. Investments into the suit, the withdrawal of CKE Defendants’ former attorneys and the appearance of their current attorneys, the pending service of Defendant Rucey Molina Cruz, written discovery extensions, the continuation of Plaintiff’s deposition, the anticipated need for the depositions of additional fact witnesses and Plaintiff’s treating physicians, and inadvertent errors in the calculation of the original Order. (Doc. 48).

Defendants now propose that an **additional 60 days** be added to the 330-day discovery period, for a total of **390 days**. In late July, counsel for BTO Investments, Inc. proposed a mediation in this case, to which all parties agreed. A true and correct copy of this email chain is attached hereto as **Exhibit A**. The mediation was eventually scheduled for Monday, September 27, 2021 with Judge Trevor Atkin (Ret.) at Advanced Resolution

1 Management. In light of the pending mediation, it was discussed that major discovery
 2 would be paused to allow the parties time to prepare for the mediation without incurring
 3 potentially unnecessary discovery costs. Consequently, the scheduled deposition of
 4 Plaintiff, which was set to take place on Monday, July 26, 2021, was cancelled. See,
 5 **Exhibit A**.

6 Initial expert disclosures are currently due on September 20, 2021, which was
 7 exactly one week before the scheduled mediation. Given the parties' interest in avoiding
 8 unnecessary discovery expenses, a draft Amended Discovery Plan and Scheduling Order
 9 was circulated on August 20, 2021. All parties agreed to the extension except for
 10 Plaintiff. Counsel for BTO Investments, Inc. called Plaintiff's counsel's office and spoke
 11 with Paul Padda, Esq. who advised that an answer would be provided the following
 12 Monday. See, Declaration of Jesselyn V. De Luna. On Monday, August 23rd, Plaintiff's
 13 counsel declined to stipulate to an extension of deadlines. A true and correct copy of this
 14 email chain is attached hereto as **Exhibit B**. Because of Plaintiff's refusal to extend the
 15 current deadlines, the mediation was cancelled to allow the parties time to focus on
 16 completing discovery to go to trial as soon as possible. However, given the expectation
 17 that the parties would participate in mediation, Plaintiff's deposition was not re-noticed. In
 18 addition to re-noticing Plaintiff's deposition, the parties will also have to produce their
 19 initial expert disclosures in an insufficient time frame. Furthermore, due to certain
 20 circumstances detailed below, defense counsel for BTO Investments, Inc., S.L.
 21 Investments, and the CKE Defendants agree that an extension of time is necessary. As
 22 such, Defendants bring forth the instant Joint Motion.

23 II. COMPLIANCE WITH LR 26-3 TO SHOW GOOD CAUSE FOR EXTENSION

24 Pursuant to the requirements of LR 26-3 regarding extending scheduled deadlines,
 25 Defendants have included herewith:

- 26 A. A statement specifying the discovery completed;
- 27 B. A specific description of the discovery that remains to be completed;
- 28 C. The reasons why the deadline was not satisfied or the remaining discovery

1 was not completed within the time limits set by the discovery plan; and

2 D. A proposed schedule for completing all remaining discovery.

3 **A. Statement Specifying the Discovery Completed**

4 The parties have conducted the following discovery to date:

5 1. Plaintiff served her Initial Disclosures on March 3, 2021

6 2. Defendant BTO Investments, Inc. served its Initial Disclosures on March 5,
7 2021

8 3. CKE Defendants served their Initial Disclosures on March 3, 2021;

9 4. Defendant BTO Investments, Inc. propounded its First Set of Interrogatories
10 and First Set of Requests for Production to Plaintiff on March 25, 2021;

11 5. Plaintiff served her First Supplement to Initial Disclosures on April 26, 2021;

12 6. Plaintiff served her Responses to Defendant BTO Investments, Inc.'s First
13 Set of Interrogatories and First Set of Requests for Production on April 26, 2021;

14 7. Plaintiff propounded her First Set of Interrogatories and First Set of
15 Requests for Production to Defendant BTO Investments, Inc. on April 27, 2021;

16 8. CKE Defendants served their First Supplement to Initial Disclosures on April
17 30, 2021;

18 9. CKE Defendants propounded their First Set of Interrogatories and First Set
19 of Requests for Production to Plaintiff on June 10, 2021;

20 10. Defendant S.L. Investments served Initial Disclosures on June 19, 2021;

21 11. Defendant BTO Investments, Inc. served its First Supplement to Initial
22 Disclosures on June 25, 2021;

23 12. Defendant BTO Investments, Inc. served its Responses to Plaintiff's First
24 Set of Interrogatories and First Set of Requests for Production;

25 13. Plaintiff served her Responses to the CKE Defendants' First Set of
26 Interrogatories and First Set of Requests for Production on July 12, 2021;

27 14. Plaintiff propounded her Second Set of Interrogatories to Defendant BTO
28 Investments, Inc. on July 28, 2021;

1 15. Plaintiff propounded her First Set of Requests for Production to Defendant
2 S.L. Investments on July 28, 2021; and

3 16. Defendant S.L. Investments propounded its First Set of Requests for
4 Admissions to Defendant BTO Investments, Inc. on August 6, 2021.

5 **B. Specific Description of the Discovery that Remains to Be Completed**

- 6 1. Additional Written Discovery;
7 2. Initial Expert Disclosures;
8 3. Rebuttal Expert Disclosures;
9 4. Deposition of Plaintiff;
10 5. Independent Medical Examination of Plaintiff;
11 6. Vocational Interview of Plaintiff;
12 7. Depositions of Respective FRCP 30(b)(6) Witnesses;
13 8. Depositions of Percipient Witnesses;
14 9. Depositions of Treating Physicians;
15 10. Depositions of Plaintiff's Expert Witnesses;
16 11. Depositions of Defendants' Expert Witnesses; and
17 12. Any Additional Discovery Deemed Necessary.

18 **C. Reasons Why the Deadline Was Not Satisfied or the Remaining Discovery**
19 **Was Not Completed Within the Time Limits Set by the Discovery Plan**

20 Defendants respectfully request that an **additional 60 days** be added to the 330-
21 day discovery period, for a total of **390 days**. The parties have been diligently working to
22 complete discovery in accordance with the current deadlines. However, certain factors
23 have necessitated an extension of the current deadlines.

24 First, the parties agreed to mediate the case, setting the mediation for September
25 27, 2021. This was done with the understanding that major discovery would be paused to
26 allow the parties time to prepare for the mediation without incurring potentially
27 unnecessary discovery costs. Consequently, Plaintiff's scheduled deposition was
28 cancelled. Plaintiff now refuses to stipulate to extend discovery deadlines, which would

1 force the parties to depose Plaintiff and gather experts within an insufficient time frame.

2 Second, Defendant BTO Investment Inc. has a new handling attorney. Defendant
3 BTO Investments, Inc. is represented by the law firm Lewis Brisbois Bisgaard & Smith,
4 LLP. The original handling attorney, Bruce C. Young, Esq., left the firm. The case was
5 internally reassigned to Josh Cole Aicklen, Esq. as the primary handling attorney.

6 Third, Plaintiff herself has a pending extension. She has not yet been able to
7 effectuate service of the Summons and Complaint on Defendant Rucey Molina Cruz.
8 Plaintiff therefore sought and was granted additional time to effectuate service. The
9 Court's Order dated May 5, 2021, extended service upon Defendant Rucey Molina Cruz
10 "up to and including 180 days from [the] Order," or until November 1, 2021. (Doc. 44). As
11 of the date of this filing, Plaintiff has not advised as to the status of service and no
12 confirmation has been provided to indicate that Mr. Cruz has been served.

13 Fourth, the parties also anticipate the need for the depositions of additional fact
14 witnesses, including former employees of the restaurant where Plaintiff was previously
15 employed. Some of these witnesses may be difficult to locate as several were also
16 teenagers or young adults who stopped working for Defendant BTO in 2018, nearly three
17 years ago. In addition, Plaintiff is seeking emotional distress damages and damages for
18 alleged future medical care and the parties therefor anticipate the need for depositions of
19 Plaintiff's treating physicians including, but not limited to, physicians at UMC Trauma, Dr.
20 Norton Roitman, Dr. Ruth Ramirez, and Dr. Ron Zedek. Coordinating these depositions
21 and accommodating the work and vacation schedules for the witnesses and the attorneys
22 involved is expected to necessitate additional discovery time.

23 For all these reasons, the parties respectfully request that the applicable discovery
24 deadlines be extended an additional 60 days. Upon a showing of good cause, this Court
25 is authorized to modify the discovery schedule. See, FRCP 6(b)(1)(A); LR 26-4. "The
26 district court may modify the pretrial schedule if it cannot reasonably be met despite the
27 diligence of the party seeking the extension." Johnson v. Mammoth Recreations, Inc.,
28 975 F.2d 604, 609 (9th Cir. 1992). Based upon the date the first Defendant answered or

otherwise appeared (December 23, 2020) (Doc. 1), the undersigned parties hereby propose the following discovery schedule pursuant to the LR 26-1 (April 17, 2020):

D. Proposed Schedule for Completing All Remaining Discovery

Defendants submit the following proposed discovery plan, which represents a sixty (60) day extension of the remaining discovery deadlines:

Current Discovery Plan & Scheduling Order		<i>Proposed</i> Amended Discovery Plan & Scheduling Order
Event	Current Deadline	Proposed Deadline
Discovery Cut-Off	November 18, 2021 (Thursday)	January 17, 2022 (Monday) [390 Days from date first defendant answers or appears - LR 26-1(b)(1)]
Amending Pleadings Adding Parties	August 20, 2021 (Friday)	October 19, 2021 (Tuesday) [90 Days Before Close of Discovery - LR 26-1(b)(2)]
Initial Expert Disclosures	September 20, 2021 (Monday)	November 18, 2021 (Thursday) [60 Days Before Close of Discovery - LR 26-1(b)(3)]
Rebuttal Expert Disclosures	October 20, 2021 (Wednesday)	December 20, 2021 (Monday) [30 days after the Initial Disclosure of Experts - LR 26-1(b)(3) is a Saturday, 12/18/21]
Dispositive Motions	December 20, 2021 (Monday)	February 16, 2022 (Wednesday) [30 Days After Close of Discovery - LR 26-1(b)(4)]

1 2 3 4	Pre-Trial Order	January 19, 2022	March 18, 2022 [30 Days After the Dispositive Motion Deadline - LR 26-1(b)(5)]
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5 With respect to the Pre-Trial Order, if dispositive motions are filed, the deadline for
6 filing a Joint Pre-Trial Order will be suspended until 30-days after a decision on the
7 dispositive motion(s) is/are rendered or until further Court notice. See, Local Rule 26-1
8 (b)(5).

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1 **III. CONCLUSION**

2 Based on the foregoing, Defendants, BTO Investments, Inc., S.L. Investments,
 3 CKE Restaurants, Inc., Carl's Jr. Restaurants, LLC, Carl Karcher Enterprises, Inc., and
 4 CKE Restaurants Holdings, Inc., respectfully request that this Court extend the discovery
 5 period by sixty (60) days from the current deadline and enter a new Scheduling Order
 6 with the dates proposed above.

7 Respectfully submitted,

8 DATED this 30th day of August, 2021.

10 LEWIS BRISBOIS BISGAARD &
 11 SMITH LLP

ALVERSON TAYLOR & SANDERS

12 */s/ Josh Cole Aicklen*

/s/ Karie N. Wilson

13 Josh Cole Aicklen, Esq.
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 14 Jesselyn V. De Luna, Esq.
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 RESTAURANTS, INC., AND CARL
 KARCHER ENTERPRISES, INC

19 GORDON REES SCULLY
 20 MANSUKHANI LLP

21 */s/ Rachel L. Wise*

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 Las Vegas, Nevada 89101
 25 Attorneys for Defendant
 26 S.L. INVESTMENTS

Order

IT IS ORDERED that ECF No. 52 is
 DENIED without prejudice. It does not
 appear that the parties met and
 conferred in accordance with LR IA
 1-3(f).

IT IS SO ORDERED

DATED: 1:09 pm, August 31, 2021



BRENDA WEKSLER
 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of LEWIS BRISBOIS BISGAARD & SMITH LLP, and that on this 30th day of August, 2021, I did cause a true and correct copy of the foregoing **DEFENDANTS' JOINT MOTION TO EXTEND DISCOVERY DEADLINES** to be filed with the Court and served to the following:

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Tony L. Abbatangelo, Esq.
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*Attorneys for Defendants Carl's Jr.
Restaurants LLC, CKE Restaurants
Holdings, Inc., CKE Restaurants, Inc.,
and Carl Karcher Enterprises, Inc.*

By /s/ Lori Tollerud
An Employee of
LEWIS BRISBOIS BISGAARD & SMITH LLP

From: [Rachel Wise](#)
To: [De Luna, Jesselyn](#); [Robert Larsen](#); [Karie Wilson](#)
Cc: [Aicklen, Josh Cole](#); [Harris, Adrina](#); [Tollerud, Lorraine](#)
Subject: [EXT] RE: Wood v. BTO Investments - Defendants' Joint Motion to Extend Deadlines
Date: Friday, August 27, 2021 4:32:47 PM
Attachments: [image001.png](#)

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This looks good. You may use my electronic signature.

From: De Luna, Jesselyn <Jesselyn.DeLuna@lewisbrisbois.com>
Sent: Friday, August 27, 2021 2:09 PM
To: Robert Larsen <rlarsen@grsm.com>; Rachel Wise <rwise@grsm.com>; Karie Wilson <KWilson@AlversonTaylor.com>
Cc: Aicklen, Josh Cole <Josh.Aicklen@lewisbrisbois.com>; Harris, Adrina <Adrina.Harris@lewisbrisbois.com>; Tollerud, Lorraine <Lorraine.Tollerud@lewisbrisbois.com>
Subject: Wood v. BTO Investments - Defendants' Joint Motion to Extend Deadlines
Importance: High

Good Afternoon,

Please see the draft Joint Motion to Extend Discovery Deadlines in the *Wood* case for your review and commentary. I also fixed the new proposed deadlines as they were a couple days off in the original e-mail proposal sent. Please advise as to any changes, or if we have your authority to affix your e-signature. Thank you!

Best,
Jesselyn

	<p>Jesselyn De Luna Attorney Jesselyn.DeLuna@lewisbrisbois.com T: 702.693.4350 F: 702.366.9563</p>
---	---

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From: [Karie Wilson](#)
To: "Rachel Wise"; [De Luna, Jesselyn](#); [Robert Larsen](#)
Cc: [Aicklen, Josh Cole](#); [Harris, Adrina](#); [Tollerud, Lorraine](#)
Subject: [EXT] RE: Wood v. BTO Investments - Defendants' Joint Motion to Extend Deadlines
Date: Monday, August 30, 2021 9:20:28 AM
Attachments: [image001.png](#)

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Thank you, Jesselyn. You may also use my electronic signature.

Karie Wilson, Esq.
Alverson Taylor & Sanders
702.384.7000 | alversontaylor.com

From: Rachel Wise <rwise@grsm.com>
Sent: Friday, August 27, 2021 4:33 PM
To: De Luna, Jesselyn <Jesselyn.DeLuna@lewisbrisbois.com>; Robert Larsen <rlarsen@grsm.com>; Karie Wilson <KWilson@AlversonTaylor.com>
Cc: Aicklen, Josh Cole <Josh.Aicklen@lewisbrisbois.com>; Harris, Adrina <Adrina.Harris@lewisbrisbois.com>; Tollerud, Lorraine <Lorraine.Tollerud@lewisbrisbois.com>
Subject: RE: Wood v. BTO Investments - Defendants' Joint Motion to Extend Deadlines

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Sent: Friday, August 27, 2021 2:09 PM
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Cc: Aicklen, Josh Cole <Josh.Aicklen@lewisbrisbois.com>; Harris, Adrina <Adrina.Harris@lewisbrisbois.com>; Tollerud, Lorraine <Lorraine.Tollerud@lewisbrisbois.com>
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Best,
Jesselyn

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